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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No.: 3:18-cr-00577-CRB

Judge: Hon. Charles Breyer

**THE UNITED STATES AND DEFENDANTS
MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN'S
JOINT REQUEST FOR INDIVIDUALIZED
VOIR DIRE FOLLOW-UP QUESTIONS**

Date: February 21, 2024

Court: Courtroom 6 – 17th Floor

Date Filed: February 16, 2024

Trial Date: March 18, 2024

1 The Court's December 06, 2023, Order for Pretrial Preparation for Criminal Jury Trial
2 (ECF No. 267) provides as follows:

3 The attached *voir dire* will be given to the venire members. Counsel
4 should submit an agreed upon set of additional requested *voir dire*
5 questions to be posed by the Court. Any *voir dire* questions on which
6 counsel cannot agree shall be submitted separately. Counsel will be
7 allowed brief follow-up *voir dire* after the Court's questioning.

8 Given the extensive proposed jury questionnaire being submitted to the Court, the United
9 States and the defendants, Dr. Lynch and Mr. Chamberlain, do not see a need to submit specific
10 *voir dire* questions in addition to the Court's customary *voir dire* questions (which we understand
11 to be those in Attachment A). However, as contemplated by the Court's order, Defendants and
12 the United States jointly request that, following the Court's customary *voir dire*, including any
13 follow-up questions the Court deems appropriate, the Court permit counsel for both sides to
14 conduct limited individual *voir dire*, as appropriate, to follow up on (1) significant responses in
15 the written questionnaires, or (2) responses given to the Court's *voir dire*.

16 Questioning in chambers may be appropriate if juror responses to the questionnaire or to
17 Court *voir dire* questions suggest that there is sensitive information at issue, or if a juror so
18 requests.

19 In the event that the Court declines to administer, or substantially revises, the proposed
20 questionnaire counsel are submitting, Dr. Lynch, Mr. Chamberlain, and the government reserve
21 the right to submit additional *voir dire* questions.
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Dated: February 16, 2024

Respectfully submitted,

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ATTACHMENT A

PLEASE ANSWER THE FOLLOWING QUESTIONS WHEN
DIRECTED TO DO SO BY THE COURT

DO NOT WRITE ON THIS PAPER.

1. STATE YOUR NAME.
2. STATE YOUR CITY OF RESIDENCE AND HOW LONG YOU HAVE LIVED THERE.
3. STATE HOW LONG YOU HAVE LIVED IN CALIFORNIA.
4. STATE YOUR OCCUPATION, **(IF RETIRED OR UNEMPLOYED, STATE YOUR PREVIOUS OCCUPATION(S)).**
5. STATE YOUR MARITAL STATUS.
6. IF MARRIED, STATE YOUR SPOUSE'S OCCUPATION.
7. IF YOU HAVE CHILDREN, STATE THEIR AGES AND THE OCCUPATION OF ANY ADULT CHILDREN.
8. IF YOU HAVE HAD PREVIOUS MILITARY SERVICE, STATE THE BRANCH OF THE SERVICE AND YOUR DUTIES WHILE IN THE SERVICE.
9. IF YOU HAVE HAD PREVIOUS JURY SERVICE, INCLUDING GRAND JURY SERVICE, STATE WHERE AND WHEN YOU WERE A JUROR. ALSO STATE WHETHER THE CASE(S) WAS CIVIL OR CRIMINAL. DID THE JURY RETURN A VERDICT? **DO NOT STATE WHAT THE VERDICT WAS.**
10. IS THERE ANY REASON WHY YOU COULD NOT BE FAIR AND IMPARTIAL IN A CASE OF THIS NATURE?